

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**The Prince Manufacturing Company
One Prince Plaza
Quincy, Illinois 62301**

ATTENTION:

Environmental Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring The Prince Manufacturing Company (Prince or you) to submit certain information about the facility at One Prince Plaza, Quincy, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Prince owns and operates an emission source at the Quincy, Illinois facility. We are requesting this information to determine whether your emission source is complying with the CAA and Illinois State Implementation Plan.

Prince must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

And by electronic mail to prentice.dakota@epa.gov and cantello.nicole@epa.gov

Prince must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks to collect information from specific individuals or entities as part of a discrete administrative action or investigation against Prince's Quincy, Illinois, facility.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Prince to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Dakota Prentice at (312) 886-6761 or prentice.dakota@epa.gov.

Date

3/23/15

George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each disk or drive so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number. In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Prince must submit the following requested for its facility located at One Prince Plaza, Quincy, Illinois (the Facility), pursuant to Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. Section 7414(a). This information must be submitted within thirty (30) calendar days from receipt of this request unless otherwise noted.

1. Within 10 days of receipt of this Request, Prince shall submit a written certification of its intent to comply with this Request. The certification must be sent to: prentice.dakota@epa.gov, cantello.nicole@epa.gov, and R5enforcement@epa.gov.

General Facility Operations

2. Provide a copy of each current air permit issued to Prince by the Illinois Environmental Protection Agency (IEPA) and the associated permit application.
3. Provide a copy of each of the following permits issued by IEPA and the associated permit applications: Permit 05080083, Permit 92060038, Permit 90020070, Permit 90020070, and Permit 75020101.
4. Provide a copy of all permit applications submitted to IEPA since March 2010.
5. Provide copies of all annual emissions reports submitted to IEPA for 2010 to the present. Provide a narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used, and any documents outlining procedures for calculating annual emissions.
6. Provide copies of any deviation or excess emission reports submitted to IEPA since March 2010.
7. Provide copies of all quarterly and semi-annual reports submitted to IEPA since March 2010.
8. Provide a list and copies of each emissions test conducted at the facility for any reason, from March 2005 to the present. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guidelines for compiling the list and preparing copies of the stack tests:
 - a. **List:** Identify the emissions unit, the date of the test, and the test method(s) used. For each test during which the source was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with the state permitting agency.

- b. **Copies:** Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
- 9. Provide copies of all visible emissions readings performed at the facility using EPA Method 9 or Method 22 from March 2010 to the present (excluding any readings provided with the reports included with Item 7, above).
- 10. Provide the steps taken responsive to abnormal emissions observed in Method 9 or Method 22 readings from March 2010 to the present.
- 11. Provide all fugitive dust control plans used at the Facility since March 1, 2010.
- 12. Provide all Preventative Maintenance Plans used at the Facility since March 1, 2010.
- 13. For each process or line at the facility associated with production, provide the following:
 - a. An overall process diagram;
 - b. A description of the process and the design capacity of each line;
 - c. A description of the equipment used in the process, including dates of installation and startup;
 - d. The design capacity of the equipment used in each line; and
 - e. A description of emission control equipment used, if any, and design specifications.
- 14. Provide a description of calciner operations including material inputs (by type and ratio or addition rate), chemical reactions in the calciner, and material type produced. Also provide estimates of emissions from the calciner with supporting documentation.
- 15. Provide the following information for each baghouse at the facility, from March 2010 to the present:
 - a. A list of all emissions units connected to the baghouse and a detailed explanation of how emissions are routed to it, including a description of any capture mechanism.
 - b. All records of the differential pressure readings taken at each baghouse in an Excel Workbook or other compatible format, including the date and time of the readings;
 - c. All inspection, maintenance, and repair logs;
 - d. Any excess opacity or opacity deviation reports, including during periods of start-up, shut-down and malfunction;

- e. Provide the operating limits for the differential pressure across each baghouse, the method used to establish the values, and the effective date of these operating limits;
 - f. For each differential pressure reading outside of the operating limits, provide the response steps taken correct the excursion; and
 - g. In an Excel Workbook or other compatible format, list periods when an emission unit was in operation, but the associated baghouse was down.
- 16. Provide a diagram of all material storage locations at the facility. Include the type of material stored at each location.
 - 17. Provide the monthly and annual throughput (in tons) for all emission sources located at the Facility for each material handled since March 1, 2010.
 - 18. Provide a list of all sources of petcoke received at the Facility since March 1, 2010. For each source, provide the amount of petcoke received on a monthly basis.
 - 19. Provide a list of all companies and offsite facilities receiving petcoke from the Facility since March 1, 2010. For each offsite facility receiving petcoke, provide the amount of material received on a monthly basis.

PM₁₀ Monitors and Siting

- 20. Prince shall install ambient air monitors for particulate matter (PM) at its facility.
- 21. Within 30 days of receipt of this information request, Prince shall submit proposed monitoring site locations for EPA review and approval prior to establishing the monitoring sites. The proposal for monitoring site locations shall include a map showing the property lines of the facility, the locations of nearby residences and industrial properties, and proposed locations of the monitoring sites. At least one monitor shall be placed in the prevailing downwind location. Prince shall submit an annual wind rose and four seasonal wind roses showing wind patterns as reported for the past five years at the nearest available meteorological station
- 22. Within 30 days of EPA approval of the monitoring site locations specified in Item 21, Prince shall install, operate, and maintain at least one ambient monitoring site at the facility. The site shall contain at least one continuous Federal Equivalent Method (FEM) real-time PM₁₀ monitor. The site shall contain at least one Federal Reference Method (FRM) PM₁₀ filter-based monitor operating every third day.
- 23. The monitoring site and monitoring equipment shall conform with the following requirements:
 - a. The PM₁₀ real-time monitor shall meet all of the specifications of FRM/FEM monitors on this list; www.epa.gov/ttn/amtic/files/ambient/criteria/reference-equivalent-methods-list.pdf;

- b. Prince shall follow all monitoring, siting, and quality assurance criteria in 40 CFR Part 58, Appendix E;
 - c. PM₁₀ concentrations from filter-based sampling shall be determined according to 40 CFR Part 50, Appendix J – “Reference Method for the Determination of Particulate Matter as PM₁₀ in the Atmosphere”;
 - d. All data collected shall be consistent with units in the National Ambient Air Quality Standards for PM₁₀; and
 - e. A data logger shall be attached to the monitors to record readings from the continuous monitors.
24. Prince shall follow all monitoring, siting, and quality assurance criteria as detailed in 40 CFR Part 58, Appendix A “Quality Assurance Requirements for SLAMS, SPMs, and PSD Air Monitoring” and Appendix D “Network Design Criteria for Ambient Air Quality Monitoring.”
 25. The monitors shall be operated in accordance with operating procedures identified in the Quality Assurance Handbook for Air Pollution Measurement Systems “Volume I: A Field Guide to Environmental Quality Assurance” and “Volume II: Ambient Air Quality Monitoring Program.”
 26. Prince shall be responsible for all operation and maintenance associated with the PM₁₀ monitors. Prince shall properly change the PM₁₀ filters in all sampling devices. Maintenance shall include, at a minimum, the replacement of any equipment and cleaning on a schedule specified in the manufacturer’s maintenance manual.
 27. Prince shall order and pay for any necessary replacement parts, accessories, maintenance, etc.
 28. Prince shall archive all filters from the PM₁₀ filter-based instruments for at least two years.
 29. Monitoring shall take place for at least one year from the date of installation.

Wind Speed and Direction Monitoring

30. Prince shall install a meteorological tower at a location representative of local wind conditions. At a minimum, the meteorological tower must continuously measure and record wind speed and wind direction at one-hour intervals throughout the entire ambient monitoring period. Prince shall correlate 1-hr and 24-hr ambient PM₁₀ measurements with wind speed and wind direction data to determine source direction and the effects of wind speed on PM₁₀ concentrations (e.g., a pollution wind rose that displays the pollution concentration and wind direction frequency). The meteorological tower must also include calibrated ambient temperature and pressure instrumentation for purposes of determining corrected (actual) PM₁₀ concentrations as recorded by the monitors. Prince

shall maintain and/or submit reports and records in accordance with the paragraphs 31-39, below.

31. With respect to the meteorological monitoring site, Prince shall follow the Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final) found at:
http://www.epa.gov/ttnamti1/files/ambient/met/Volume%20IV_Meteorological_Measurements.pdf
32. The internal clocks of all PM10 analyzers, data loggers, and the wind speed and wind direction data logger shall be synchronized to within 60 seconds of each other (local time and not adjusted for Daylight Savings Time) and shall be checked against a calibrated reference clock at least once every 30 days. Instrument clocks that are more or less than 60 seconds from the reference clock shall be reset to within 60 seconds of the reference clock. Each of these inconsistencies and each reset time shall be noted in the study log.
33. Prince shall be responsible for maintenance associated with the meteorological tower on a schedule specified in the manufacturer's maintenance manual. Prince shall order and pay for any necessary replacement parts, accessories, maintenance, etc.

General Requirements Applicable to All Requests

34. Within 30 days of EPA approval of the monitoring sites, Prince shall submit a Quality Assurance Project Plan (QAPP) to EPA. The guidance document for writing a QAPP is "EPA Guidance for Quality Assurance Project Plans," EPA QA/G-5, EPA/600/R-02/009 - December 2002. The guidance is available at <http://www.epa.gov/QUALITY/qs-docs/g5-final.pdf>.
35. Prince shall provide EPA access to the monitoring sites and respond to any inquiries regarding monitor siting, operations, or maintenance. In the event that an inspector or auditor identifies problems, Prince shall take appropriate corrective actions. Any changes made to monitor siting, operations, or maintenance shall be approved by EPA prior to the change.
36. Prince shall keep a daily log and monthly reports of the following information:
 - a. Each site visit and operator activities;
 - b. Any monitoring system downtime (date, time, duration, and reason) along with any corrective actions taken;
 - c. Any possible interferences observed by the operator such as nearby construction or demolition; and
 - d. Any calibration data provided by the manufacturer or performed by Prince.

37. Hourly data from each monitor and meteorological monitoring site, and 24-hour data from gravimetric monitors shall be downloaded as ASCII comma-delimited files and provided to EPA on CD every month. The files should have a single "header" row, with all following rows being individual records, and all columns being a single variable according to the header row. All filter analysis data, including any specification data shall also be provided.
38. Monthly reports and data specified in Items 22 and 23 above shall be submitted to EPA for a period of at least one year. Each report is due within 14 days of the end of the month being reported. At the end of the tenth month, Prince may apply to EPA for a modification or termination of this request after at least 12 months of data is collected. At that time, EPA will re-evaluate and adjust, if necessary, the Section 114(a) request.
39. Prince shall submit these monthly reports to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

and also submit the monthly reports via electronic mail to prentice.dakota@epa.gov and to cantello.nicole@epa.gov.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A),(B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Kathy Jones, certify that I sent a Request to Provide

Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Environmental Manager
The Prince Manufacturing Company
One Prince Plaza
Quincy, Illinois 62301

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Eric Jones, Manager
Bureau of Air, Compliance and Enforcement Section
Illinois Environmental Protection Agency
P.O. Box 19506
Springfield, Illinois 62794

On the 23rd day of March 2015.

Kathy Jones
Loretta Shaffer, Program Technician
AECAB, Planning and Administration Section

CERTIFIED MAIL RECEIPT NUMBER: 7014 2870 0001 9580 5180